

# EXHIBIT 11

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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON  
FOR KING COUNTY

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The Estate of SUMMER JOLIE	)	
WILLIAMS TAYLOR, by and	)	
through MATTHEW D. TAYLOR,	)	
Personal Representative, ZOE	)	
ADBERG, SARA ANDERSON, MEGAN	)	20-2-14351-1 SEA
BUSS, GRACE CARMACK, LEANNA	)	
CARR, AISLING COONEY, ABIE	)	
EKENEZAR, EDWARD FARMER,	)	
NIMA FORGHANI, NOAH FOWLER,	)	
ZACHARY GARDNER, IAN GOLASH,	)	
GRACE GREGSON, MIRANDA	)	
HARDY, LEXUS HARTLEY,	)	
CLAYTON HOLLOBAUGH, JASON	)	
SCHIERER as guardian ad	)	
litem for minor MALICHI HOWE	)	
a.k.a. BRYAUNA HOWE, JESSE	)	
HUGHEY, AUBREANNA INDA, MARY	)	
JURGENSEN, TIMOTHY KAUCHAK,	)	
JOHN W. KELLIHER, JENNA	)	
KINYON, BEN KOENIGSBERG,	)	**Caption continued**
JACOB KOENIGSBERG, SETH	)	
KRAMER, ERIC LOOK, DANIEL	)	
LUGO, JACOB MARTIN, JOSHUA	)	

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VIDEOTAPED VIDEOCONFERENCE DEPOSITION UPON ORAL  
EXAMINATION OF  
MAYOR JENNY DURKAN

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(All participants appearing via Zoom videoconference.)

Witness located in  
Seattle, Washington

DATE TAKEN: FEBRUARY 28, 2022  
REPORTED BY: PATSY D. JACOY, CCR 2348

1 people have been?

2 A. I'm not -- I can't speculate on that.

3 Q. My understanding is you've testified that you  
4 did not change your texts to be deleted after 30 days.  
5 Am I correct?

6 A. That's correct, that is correct.

7 Q. Do you even know how to -- you -- if someone  
8 said, "Can you please manually change your phone to  
9 delete your texts after 30 days," would you know how to  
10 do that?

11 MR. SHAW: Foundation.

12 A. I do now.

13 Q. (BY MS. KOEHLER) Okay. But at the time did  
14 you know?

15 A. To my best of my recollection, no.

16 Q. I mean, I wouldn't know how to do that. Do  
17 you believe it was an IT person that did it?

18 MR. SHAW: Objection; foundation, form.

19 A. Again, I -- I won't speculate as to that.

20 Q. (BY MS. KOEHLER) Did you instruct anybody to  
21 delete your texts?

22 A. No, ma'am.

23 Q. In the mayor's office how does it work in  
24 terms of tech, tech devices? Do you follow the  
25 instructions of the IT department or does the IT

## C E R T I F I C A T E

STATE OF WASHINGTON )  
 )  
COUNTY OF KING )

I, Patricia D. Jacoy, a Certified  
Shorthand Reporter in and for the State of Washington,  
do hereby certify that the foregoing transcript of the  
deposition of MAYOR JENNY DURKAN taken on  
February 28, 2022 is true and accurate to the best of  
my knowledge, skill and ability.



*Patricia D. Jacoy*  
Patricia D. Jacoy, CSR 2348



## E R R A T A

**CASE NAME:** Estate of Taylor, et al. v. City of Seattle and King County

**DATE TAKEN:** 2/28/2022

**WITNESS:** Mayor Jenny Durkan

### CORRECTIONS

Page	Line	Now reads	Should read
19 20	23 to 2	And I think it was the consent decree itself that was signed in 2012, so the period of time the investigation, leading up to the investigation, doing that is in that time frame, you're correct.	And I think it was the consent decree itself that was signed in 2012, so the period of time the investigation, leading up to the investigation, doing that is in that time frame, you're correct. <b>My office and DOJ received a letter from a number of civil rights groups requesting an investigation of SPD in December 2010, that we announced the investigation in March 2011, delivered the investigation results in December 2011, and concluded negotiations and the consent decree entered in July 2012. (add this last bolded sentence.)</b>
25	13	hope	<b>hook</b>
62	7	stand up	<b>sin</b>
97	1	disperse	<b>dispersal</b>
97	7	under the freeway	<b>on</b> the freeway
123	10-11	businesses that were broken windows	businesses that <b>had some</b> broken windows
138	6	sights	insights
139	14	Missing word and punctuation issue. Missing the word "I" before the word "relied." Should be a semi-colon after her	should be a semicolon, not a comma after <b>"I</b> relied heavily upon her;



141	8	Punctuation issue; should be a period or semicolon after the word "ethics" not a comma	ethics. (note the punctuation – a period after the word ethics.
226	20	Office didn't face judgment	Office didn't <b>make</b> judgments
235	12	Missing the word "not"	I have <b>not</b> protested on the freeway.
242	12	Again, missing the word "not" which should be inserted before just for protests.	Washington State Patrol and that's <b>not</b> just for protests."

  
 Signature of Deponent



## DECLARATION

**CASE NAME:** Estate of Taylor, et al. v. City of Seattle and King County

**DATE TAKEN:** 2/28/2022

**WITNESS:** Mayor Jenny Durkan

I declare under penalty of perjury under the laws of the State of Washington that I have read my within deposition, and the same is true and accurate, save and except for changes and/or corrections, if any, as indicated by me on the ERRATA flyleaf page above.

  
\_\_\_\_\_  
Mayor Jenny A. Durkan

Signed on the 6<sup>th</sup> day of April, 2022.